

REMARKS**I. General**

Claims 1-40 are currently pending, and all are rejected by the current Office Action. No claims are amended by this response. Applicants hereby traverse the outstanding rejections and request reconsideration and withdrawal in light of the remarks contained herein.

II. Claim Rejections

Claims 1-40 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 5,903,996 (hereinafter, *Morley*). Applicants traverse the rejections as follows.

A. Claims 1-16

To anticipate a claim under 35 U.S.C. § 102, a reference must teach every element of the claim, see M.P.E.P. § 2131. Moreover, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, “[t]he identical invention must be shown in as complete detail as is contained in the . . . claim,” see M.P.E.P. § 2131, citing *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913 (Fed. Cir. 1989).

Claim 1 requires, “a display for receiving the image output and displaying a displayed image in the first spectral band.” The rejection cites Col. 9, lines 25-34 of *Morley* as teaching the feature; however, Applicants assert that *Morley* does not teach this feature. While *Morley* discloses an item referred to as a “display” (see item 76 of FIGURE 2A), the cited item does not perform the functions of “receiving the image output” or “displaying a displayed image in the first spectral band” as claim 1 requires. Instead, the cited item presents a range output to a user. Col. 13, lines 25-30 of *Morley* clearly shows that display 76 does not meet the claim elements. Thus, *Morley* does not teach each and every feature of claim 1.

Dependent claims 2-16 each depend either directly or indirectly from independent claim 1 and, thus, inherit all of the limitations of independent claim 1. Thus, *Morley* does not teach all features of claims 2-16. It is respectfully submitted that dependent claims 2-16 are allowable at least because of their dependence from claim 1 for the reasons discussed above.

Accordingly, Applicants respectfully request removal of the 35 U.S.C. § 102 rejection of claims 1-16.

B. Claims 17-24

Claim 17 recites, “generating a visual representation of the image at the display.” *Morley* does not teach the above-recited feature of claim 17. Col. 10, lines 20-25, which are cited by the Office Action as teaching this feature, disclose using a Charge Coupled Device (CCD) 87 to capture an image electronically and to provide the image via an electrical interface. There is no teaching, however, of what happens to the image once it is sent via conductor 87b. In particular, there is no disclosure that a “visual representation” of the image is generated at a display.

Claim 17 also recites, “relaying the visual representation of the image.” Once again, there is no teaching of what happens to the image once it is sent via conductor 87, and therefore, *Morley* does not disclose “relaying the visual representation of the image.” Thus, *Morley* does not teach each and every feature of claim 17.

Dependent claims 18-24 each depend either directly or indirectly from independent claim 17 and, thus, inherit all of the limitations of independent claim 17. Thus, *Morley* does not teach all claim limitations of claims 18-24. It is respectfully submitted that dependent claims 18-24 are allowable at least because of their dependence from claim 17 for the reasons discussed above. Accordingly, Applicants respectfully request removal of the 35 U.S.C. § 102 rejection of claims 17-24.

C. Claims 25-32

Claim 25 recites, “generating a visual representation of the IR image at the display.” *Morley* does not teach the recited feature of claim 25. As explained above with regard to claim 1, the component referred to in the reference as a “display” (item 76 of FIGURE 2A in *Morley*) presents only a range output to a user. The item does not generate a visual representation of an image, and therefore, the reference does not teach, “generating a visual representation of the IR image at the display,” as claim 25 recites. Thus, Col. 9, lines 25-34 and Col. 13, lines 25-30 fail to teach the above-recited feature of claim 25.

Further, as explained above with regard to claim 17, the reference discloses use of a CCD to capture an image electronically and to provide the image via an electrical interface in Col. 10, lines 20-25. However, there is no teaching of what happens to the image once it is sent via conductor 87b. In particular, *Morley* does not disclose “generating a visual representation” of an image, and therefore, does not teach the above-recited feature of claim 25. Moreover, it does not teach a display. Thus, *Morley* does not teach each and every feature of claim 25.

Dependent claims 26-32 each depend either directly or indirectly from independent claim 25 and, thus, inherit all of the limitations of independent claim 25. Thus, *Morley* does not teach all claim limitations of claims 26-32. It is respectfully submitted that dependent claims 26-32 are allowable at least because of their dependence from claim 25 for the reasons discussed above. Accordingly, Applicants respectfully request removal of the 35 U.S.C. § 102 rejection of claims 25-32.

D. Claims 33-40

Claim 33 recites, “a display for receiving and displaying the image output.” *Morley* does not teach the recited feature of claim 33. Contrary to the assertion of the Office Action, Col. 10, lines 20-25 of *Morley* fails to teach the above-recited feature. As explained above with regard to claim 17, the referenced passage teaches using a CCD to capture and provide an image electronically; however, the passage does not teach “displaying the image output,” as claim 33 recites, because the passage does not teach what happens to the image once it is sent via conductor 87b. Specifically, there is no disclosure that an image output is displayed. Further, it does not teach a display. Thus, *Morley* does not teach each and every feature of claim 33.

Dependent claims 34-40 each depend either directly or indirectly from independent claim 33 and, thus, inherit all of the limitations of independent claim 33. Thus, *Morley* does not teach all claim limitations of claims 34-40. It is respectfully submitted that dependent claims 34-40 are allowable at least because of their dependence from claim 33 for the reasons discussed above. Accordingly, Applicants respectfully request removal of the 35 U.S.C. § 102 rejection of claims 34-40.

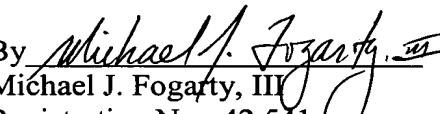
III. Conclusion

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicants believe no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2380, under Order No. 46030/P040US/10407171 from which the undersigned is authorized to draw.

Dated: July 27, 2004

Respectfully submitted,

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